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Ms. Sandy Brackins
Ershigs, Inc.
7710 Vancouver Mall Drive, Suite G
Vancouver, WA 98667

January 30, 2008

Re: IKEC – Clifty Creek Stack Liner Project
Review Request
RR 077-25432-00026

Dear Ms. Brackins:

On October 19, 2007, Ershigs, Inc. submitted an application to the Office of Air Quality (OAQ) for on-site fabrication of reinforced plastics for breeching liner and stack liner for the new Stack 14 and Flue Gas Desulfurization (FGD) Scrubber project to be located at 1335 Clifty Hollow Road, S.R. 56 West, Madison, Indiana, 47250. The IDEM, OAQ, determined that no permit is warranted because the Clifty Creek Stack Liner Project consists only of general construction activities related to the construction of an emission unit. [326 IAC 2-1.1-3(e)(17)]

The construction process will include the following:

- (a) One (1) non-atomized open molding reinforced plastics manufacturing process utilizing one (1) resin bath and two (2) electrically heated 250 gallon resin storage day tanks for the on-site fabrication and installation of breeching liner and stack liner for the new Stack 14 project at the IKEC – Clifty Creek Street Generating Station. Maximum corrosion resistant resin usage of 1,350 pounds per hour (lb/hr) and 722 tons for the duration of the on-site fabrication project. The plastics manufacturing resin contains styrene and the manufacturing process consists of:
- (1) One (1) filament winding machine and mandrel for resin application, identified as emission unit ID Filament Winding, maximum capacity of seven hundred (700) pounds of resin per hour, exhausting to stack/vent 001.
 - (2) One (1) non-atomized spray layup gun, identified as emission unit ID Non-Atomized Mechanical, maximum capacity of five hundred (500) pounds of resin per hour, exhausting to stack/vent 001.
 - (3) One (1) manual layup process for resin utilizing brushes, rollers and the hand application of resin, identified as emission unit ID Manual Layup, maximum capacity of one hundred fifty (150) pounds of resin per hour, exhausting to stack/vent 001.
- (b) Two (2) cold cleaner degreasing tanks, utilizing non-HAP dibasic ester solvent, with combined maximum surface area of 76 ft², identified as emission unit ID 004, exhausting to stack/vent 001.

- (c) One (1) horizontal, unheated, above ground, fixed roof, bulk resin storage tank, with a maximum storage capacity of 6,350 gallons, used to store resin containing styrene, identified as emission unit ID 005.
- (d) One (1) propane indirect fired space heater, maximum heat input of 3.5 million BTU per hour, identified as emission unit ID 006.

This decision is subject to the Indiana Administrative Orders and Procedures Act – IC 4-21.5-3-5. If you have any questions on this matter, please contact Kimberly Cottrell, of my staff, at 317-233-0870 or 1-800-451-6027, and ask for extension 3-0870.

Sincerely/Original Signed By:

Matthew Stuckey, Deputy Branch Chief
Permits Branch
Office of Air Quality

KLC

cc: File – Jefferson County
Jefferson County Health Department
U.S. EPA, Region V
Air Compliance Inspector – Dan Hancock
Compliance Data Section
Permits Administration and Development

Mr. Donald T. Fulkerson
Environmental Affairs Director
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Mr. Tom Pilcher
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